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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SKYWEST PILOTS ALPA ORGANIZING
COMMITTEE, *et al.*,

Plaintiffs,

vs.

SKYWEST AIRLINES, INC.,

Defendant.

CASE No. C-07-2688 CRB

**DECLARATION OF RUSSELL
JACOBIE IN OPPOSITION TO
DEFENDANT'S MOTION TO
TRANSFER VENUE**

Date: June 5, 2007

Time: 3:00 pm

Place: Courtroom 8, 19th Floor

Declaration of Russell Jacobie

1. My name is Russell Jacobie. I reside in Fresno, California and currently serve as a captain for SkyWest. I am domiciled in Fresno for SkyWest purposes. I make this declaration based on my own personal knowledge, and, if called upon to testify, I could and would competently testify thereto.

2. I routinely fly into and out of California airports for SkyWest, including, among others SFO, LAX, and Fresno.

3. I have been and remain an open and active member of the SkyWest Pilots ALPA Organizing Committee [the "OC"], which was formed to encourage the pilots of SkyWest to elect ALPA as their collective bargaining representative. The pilots of SkyWest are not represented by a labor union for collective bargaining purposes.

4. On Tuesday, May 29, 2007, I viewed information on SkyWest's website about the number of pilots domiciled in California. SkyWest states on its website that 389 pilots are domiciled in California, including in Fresno, Los

Angeles, Monterey, Palm Springs, Sacramento, San Diego, San Francisco, San Luis Obispo, Santa Barbara.

5. I have repeatedly seen materials posted by the SkyWest Airlines Pilot Association ("SAPA") in crew lounges in California, including in SFO.

6. I have in the past attempted to post ALPA-related material in the crew room in SFO. I posted ALPA-related material in an area of the crew room where non-SkyWest and non-work related material is also routinely posted. When I next returned to the crew room, the ALPA flyer I had posted had been removed, even though other non-SkyWest and non-work related material remained. To the best of my recollection, this occurred within approximately 24 hours.

7. I have had similar experiences elsewhere in California. In Fresno, I placed ALPA-related flyers and ALPA pens in pilots' mailboxes (known as V-files). When I checked the V-files again, all of the materials I had placed in the V-files had been removed. To the best of my recollection, this occurred within approximately one week. There are more than 80 pilots domiciled in Fresno. It is extremely unlikely that every single pilot had come through

the crew room within that one week period in order to remove the materials himself or herself. Moreover, many of the ALPA pens I had placed in the V-files had been broken and placed in my mailbox.

8. On another occasion I placed material in the Fresno crew room to inform pilots that the OC was hosting an informational session right across the hall. I also posted a notice on the door of the room where we were meeting so that pilots passing by would know we were holding an informational session in that room. We rented the meeting room from the Fresno airport; it was not a SkyWest room. At the time I placed materials in the crew room and posted a notice on the meeting room door across the hall, the only other people in the crew room were members of SkyWest management.

9. I walked out of the meeting room and back into the crew room 15 minutes later. By then, the notice I had placed on the door of the room where we were meeting had

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been removed, and the material I had placed in the crew room had been thrown into the trash.

Under penalty of perjury, I affirm that the information herein is complete and accurate to the best of my ability and recollection.

5/31/07
Date

Russell Jacobie
Russell Jacobie